

1 THE HONORABLE JAMAL N WHITEHEAD  
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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

10 JOHN ELLIOTT, RICARDO CAMARGO,  
11 JAVIER ROVIRA, and BRADLEY SMITH,

12 v.  
13 Plaintiffs,

14 VALVE CORPORATION,  
15 Defendant.

Case No. 2:24-cv-01218-JNW

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION TO APPOINT  
HAGENS BERMAN SOBOL SHAPIRO  
LLP AND BUCHER LAW PLLC AS  
INTERIM CO-LEAD CLASS COUNSEL**

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17 Now before the Court is the Plaintiffs' Motion to Appoint Hagens Berman Sobol Shapiro  
18 LLP and Bucher Law PLLC as Interim Co-lead Class Counsel.

19 The Court has carefully reviewed the motion and concludes that Hagens Berman Sobol  
20 Shapiro LLP and Bucher Law PLLC should be appointed, and are hereby appointed, as Interim  
21 Class Counsel for the proposed consumer class identified in Plaintiffs' operative pleading  
22 ("Consumer Class") (ECF No. 1). The Court concludes that such appointment will aid in achieving  
23 efficiency and economy in what is likely to be expensive and complicated litigation, and that such  
24 appointment will enhance fairness to all parties concerned, as well as the proposed Consumer  
25 Class.

26 In reaching these conclusions, the Court has carefully reviewed the motion and its  
27 accompanying submissions, including the declarations and attachments submitted on behalf of the  
28 appointed firms, and has also considered the factors outlined in Rule 23(g) of the Federal Rules of

1 Civil Procedure and other authority cited by the Plaintiffs. The Plaintiffs' submission demonstrates  
2 that the appointment of Hagens Berman Sobol Shapiro LLP and Bucher Law PLLC satisfies the  
3 requirements of Rule 23(g). Relevant considerations include the work counsel has done in  
4 identifying and investigating potential claims in the action; counsel's experience in handling class  
5 actions, other complex litigation, and the types of claims asserted in the action; counsel's  
6 knowledge of the applicable law; and the resources that counsel has available and will commit to  
7 representing the class.

8 Therefore, with respect to the proposed Consumer Class, Hagens Berman Sobol Shapiro  
9 LLP and Bucher Law PLLC, as Interim Class Counsel, shall have authority over the following  
10 matters on behalf of the proposed Consumer Class:

- 11 a. convening meetings of Plaintiffs' counsel;
- 12 b. the initiation, response, scheduling, briefing, and argument of all motions;
- 13 c. the scope, order, and conduct of all discovery proceedings;
- 14 d. making such work assignments as among themselves and other Plaintiffs' counsel  
15 as they may deem appropriate;
- 16 e. collecting time and expense reports from all Plaintiffs' counsel on a periodic basis;
- 17 f. the retention of experts;
- 18 g. the designation of which Plaintiffs' attorneys shall appear at hearings and  
19 conferences with the Court;
- 20 h. settlement negotiations and agreements with Defendant;
- 21 i. allocate among counsel any award of attorney's fees and expenses; and
- 22 j. all other matters concerning the prosecution of the Action on behalf of the proposed  
23 Consumer Class.

24  
25 DATED this \_\_\_\_ day of \_\_\_\_\_, 2024.  
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27 IT IS SO ORDERED.  
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2 Hon. Jamal N Whitehead  
3 United States District Judge  
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5 Presented by:  
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7 HAGENS BERMAN SOBOL SHAPIRO LLP  
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9 Steve W. Berman (WSBA No. 12536)

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[PROPOSED] ORDER - 4